

NON-COMPLIANCE OF S.D. FLA. L.R. 3.1a

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

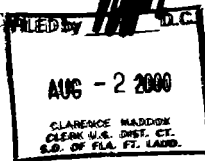
Plaintiff,
vs.

LIONEL J. HANNA

Defendant.

CASE NO.: 00 6032 CR ZLOC FILED BY [Signature] D.C.

Florida Bar No.: 198242



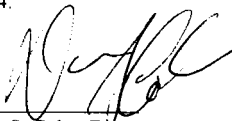
**DEFENDANT'S OBJECTION TO NOTICE OF GOVERNMENT'S INTENT TO
INTRODUCE FEDERAL RULES EVIDENCE 404 (B) SIMILAR ACT EVIDENCE**

COMES NOW the Defendant LIONEL J. HANNA, by and through his undersigned attorney, and files this his Objection to Notice of Government Intent to Introduce Federal Rule of Evidence 404 (B) Similar Act Evidence as follows:

1. That on July 5, 2000 the government filed a Notice of Government's Intent to Introduce Federal Rules Evidence 404 (B) Similar Act Evidence in this cause.
2. That pursuant to Federal Evidence 404 (b) the government's introduction of such evidence will only be to prove Defendant's character in order to show he acted in the case at bar in conformity with his prior conviction.
3. That, furthermore, pursuant to Federal Rule of Evidence 403 the probative value of any such evidence will be substantially outweighed by the danger of unfair prejudice, confusion of the issues, misleading the jury, undue delay, waste of time, or needless presentation of cumulative evidence.

[Signature]
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I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed on the 28th day of July 2000 to Donald F. Chase, II, Assistant United States Attorney, 500 East Broward Boulevard, Suite 700, Fort Lauderdale Fl 33394.

A handwritten signature in black ink, appearing to read 'Don S. Cohn', is written over a horizontal line.

Don S. Cohn, Esq.
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